## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

C. A. No. 2:19-cv-17213 (MCA)

Return Date: Jan. 3, 2022

BRENDA SMITH, BROAD REACH CAPITAL, LP, BROAD REACH PARTNERS, LLC, and BRISTOL ADVISORS, LLC,

Defendants.

NOTICE OF MOTION OF RECEIVER, KEVIN DOOLEY KENT, TO SEAL EXHIBITS A AND B [DKT NO. 140] TO MOTION TO APPROVE A SETTLEMENT RESOLVING THE RECEIVER'S CLAIMS AGAINST G.F. [DKT NO. 139]

PLEASE TAKE NOTICE that the undersigned, on behalf of the Receiver, Kevin D. Kent, Esq. will move before the Honorable Madeline Cox Arleo, U.S.D.J., United States District Court for the District of New Jersey, Martin Luther King Jr. Federal Building and U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, on January 3, 2022 or as soon thereafter as the Court permits, at a date and time to be determined by the Court, for an order sealing Exhibits A and B (Dkt. No. 140) to the Receiver's Motion to Approve a Settlement Resolving the Receiver's Claims Against G.F. (Dkt. No. 139).

## PLEASE TAKE FURTHER NOTICE THAT, in support of this Motion,

the undersigned will rely upon the accompanying Brief and Declaration of the Receiver as required by L. Civ. R. 5.3 (c), which are incorporated herein by reference.

PLEASE TAKE FURTHER NOTICE that the undersigned requests that the proposed form of Order submitted herewith be entered by the Court.

Respectfully submitted,

Dated: 12/3/2021

s/Robin S. Weiss Robin S. Weiss, Esquire Andrew S. Gallinaro, Esquire Conrad O'Brien PC 1500 Market Street, Suite 3900 Centre Square, West Tower Philadelphia, PA 19102

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Esq.